

RUIZ LAW FIRM
 1055 Whitney Ranch Drive, Suite 110
 Henderson, NV 89014
 702.850.1717 / 702.850.1716 (fax)

LAWRENCE RUIZ, ESQ.
 Nevada Bar No. 11451
RUIZ LAW FIRM
 1055 Whitney Ranch Drive, Suite 110
 Henderson, NV 89014
 Phone: (702) 850.1717
 Fax: (702) 850.1716
lawrence@lmruizlaw.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMIE HATCH,

Plaintiff,

vs.

COUNTRY PREFERRED INSURANCE
 COMPANY, a Georgia Foreign Insurance
 Company; DOES 1-10; and ROE Entities 11
 through 20, inclusive jointly and severally,

Defendants.

Case No.: 2:23-cv-01705-JAD-BNW

**Proposed Stipulated Discovery Plan and
 Scheduling Order: Submitted in Compliance
 with LR 26-1(b)**

*Check only if you include a Counterclaim or
 Crossclaim: ☒*

COUNTRY PREFERRED INSURANCE
 COMPANY, an Illinois Corporation,

Counterclaimant,

vs.

JAMIE HATCH,

Counter- Defendant.

The parties held a conference under Federal Rule of Civil Procedure 26(f) on November 7, 2023. The parties now submit their proposed discovery plan and scheduling order in compliance with LR 26-1(b).

///

1. Discovery Cut-Off Date. The first defendant answered or otherwise appeared on **October 26, 2023**. The discovery cut-off date is **April 3, 2024**.

RUIZ LAW FIRM
 1055 Whitney Ranch Drive, Suite 110
 Henderson, NV 89014
 702.850.1717 / 702.850.1716 (fax)

2. Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and add parties is **January 4, 2024**.
3. Expert and Rebuttal-Expert Disclosures. The deadline to disclose experts is February 5, 2024. The deadline to disclose rebuttal experts is **March 4, 2024**.
4. Dispositive Motions. The deadline to file dispositive motions is **May 3, 2024**.
5. Pretrial Order. The deadline to file a pretrial order is **June 3, 2024**.
6. Fed. R. Civ. P. 26(a)(3). The disclosures required by this rule and any objections to them must be included in the joint pretrial order.
7. Alternative Dispute Resolution. The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes but concluded that said processes would not be beneficial to the parties at this time.
8. Alternative Forms of Case Disposition. The parties certify that they considered consent to trial by a magistrate Judge under 28 U.S.C. §636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01) and do not consent to either trial by magistrate Judge or use of the Short Trial Program.
9. Electronic Evidence. The parties certify that they discussed whether to present evidence in electronic format to the jurors for the purpose of jury deliberations; however, to date, no electronic evidence has been disclosed.

RUIZ LAW FIRM

KRAVITZ, SCHNITZER, JOHNSON &
 WATSON, CHTD.

/s/ Lawrence Ruiz

/s/ Gina M. Mushmeche

 LAWRENCE RUIZ, ESQ.
 Nevada Bar No. 11451
 1055 Whitney Ranch Drive, Suite 110
 Henderson, NV 89014
Attorney for Plaintiff/Counter-Defendant

 GINA M. MUSHMECHE, ESQ.
 Nevada Bar No. 10411
 8985 S. Eastern Avenue, Suite 200
 Las Vegas, NV 89123
Attorney for Defendant/Counterclaimant

*Hatch v. Country Preferred and related
 matters
 Case No.: 2:23-cv-01705-JAD-BNW*

IT IS SO ORDERED:

RUIZ LAW FIRM

1055 Whitney Ranch Drive, Suite 110
Henderson, NV 89014

702.850.1717 / 702.850.1716 (fax)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



UNITED STATES MAGISTRATE JUDGE

Dated: 12/5/2023